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NORTHERN DISTRICT OF TEXAS
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS 2019 JUL -1 PM 2:14
DALLAS DIVISION

DEPUTY CLERK

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UNITED STATES OF AMERICA

v.

SANJAY NANDA (01)

Case No. 3:19-CR- 318

8-19CR-318-K

INFORMATION

The United States Attorney charges:

At all times material to the allegations in this information:

A. Introduction

1. Sabre GLBL Inc. ("Sabre") was in the business of developing and selling technology-based products and services to the global travel industry. Sabre's headquarters was at 3150 Sabre Drive, Southlake, Texas, in the Northern District of Texas.

2. Sabre's Accounts Payable Department maintained a general e-mail account to which invoices from third-party vendors were submitted for payment. This e-mail account was hosted on a server located in Oklahoma.

3. From on or about July 8, 2010, to on or about October 17, 2015, the defendant, **Sanjay Nanda** ("Nanda"), was employed by Sabre as Senior Vice-President of Airline Solutions. In this position, **Nanda** had the authority to hire consultants and approve invoices for payment. **Nanda's** office was located at Sabre headquarters.

4. For at least the period January 1, 2011, through September 30, 2015, **Nanda** resided in Irving, Texas, in the Dallas Division of the Northern District of Texas.

5. On or about February 1, 2005, the Secretary of State for the State of Georgia issued a Certificate of Incorporation to Sadak Ventures, LLC ("Sadak"). The incorporation records identified the Registered Agent for Sadak as Sanjay Nanda, 4310 Renaissance Way, N.E., Atlanta, Georgia; they also listed the company's principal mailing address as 4310 Renaissance Way, N.E., Atlanta, Georgia. In 2008, Sadak was dissolved for non-payment of fees.

6. In or about June 2010, **Nanda** wrote a letter to the Georgia Secretary of State petitioning to have Sadak reinstated as a corporation in good standing in Georgia.

7. On or about December 5, 2011, **Nanda** opened up Advantage Business Checking Account No. xxxxxx7489 in the name of Sadak, LLC at a Wells Fargo Bank branch located in Georgia.

B. The Scheme and Artifice to Defraud

8. Beginning on or about September 1, 2011, and continuing through on or about September 30, 2015, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Sanjay Nanda**, knowingly, and with intent to defraud, devised a scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses and representations, and material omissions. The object of the scheme was to embezzle money from Sabre by creating and submitting for payment invoices from fictitious vendor Sadak for consulting services that were never performed for or on

behalf of Sabre, causing Sabre to issue payments to an account under **Nanda's** control, and to use the embezzled money for personal expenses.

C. Manner and Means of the Scheme

9. It was a part of the scheme and artifice to defraud that during the period beginning on or about September 1, 2011, and continuing through on or about September 30, 2015, **Nanda** did, in the Northern District of Texas, and elsewhere:

- a. For an unauthorized purpose, and contrary to the best interests of his employer, create a false and fictitious master services agreement between Sabre and Sadak under the terms of which Sadak agreed to perform various consulting services for Sabre in return for payment, signing the contract on behalf of Sabre and on behalf of Sadak, as V.G., a principal of Sadak, without authorization.
- b. For an unauthorized purpose, and contrary to the best interests of his employer, create false Sadak invoices claiming the company performed consulting services work for Sabre during a specified period of time, and requesting payment of a designated amount for that work.
- c. Create the false invoices at his Irving residence, and transport each from his residence to Sabre headquarters, with the intent and for the purpose of submitting the invoice for approval and payment through the process used to approve and pay authentic, valid invoices submitted by authorized third-party vendors;

- d. For an unauthorized purpose, and contrary to the best interests of his employer approve the false invoices for payment as if they were authentic, valid invoices for work performed, intending to mislead any Sabre employees or agents reviewing the company financial records into believing that the Sadak invoices was authentic;
- e. Directly or through subordinates, submit the approved and fictitious invoices to Sabre's Accounts Payable Department, knowing and intending that employees in this office would enter pertinent data from the invoices into Sabre's accounting and payment system; and knowing and intending that in the normal course of business, Sabre's accounting and payment system would cause ACH payments to be issued from an account at Citibank, N.A. to Wells Fargo Account No. xxxxxx7489, in the name of Sadak, in the amount designated on the invoice.

10. It was further a part of the scheme that **Nanda** concealed material information from Sabre officials and employees, specifically, that he had created, submitted, and approved for payment false and fraudulent invoices for work that was not done, and that the named payee, Sadak Ventures, LLC, was a company over which he exercised sole control.

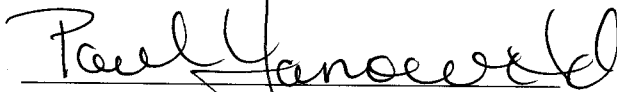
Count One
Wire Fraud
(Violation of 18 U.S.C. § 1343)

11. The United States Attorney hereby adopts, realleges, and incorporates by reference herein the allegations set forth in the preceding paragraphs of this information.

12. On or about September 11, 2015, in the Dallas Division of the Northern District of Texas, and elsewhere, defendant, **Sanjay Nanda**, for the purpose of executing and carrying out the aforesaid scheme and artifice to defraud, and for obtaining money and property by means of false material and fraudulent pretenses, representations, and promises, and attempting to do so, did knowingly, and with intent to defraud, cause to be transmitted in interstate commerce by means of wire and radio communication, certain writings, signs, signals and sounds, specifically, instructions to pay \$249,900.00 to a Wells Fargo Bank account in the name of Sadak LLC, originating from a computer located in Southlake, Texas, on or about this date, and sent to an e-mail account hosted on a server in Oklahoma.

In violation of 18 U.S.C. § 1343.

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